

**Exhibit A To Motion To Seal
Emphasis Added Below To
Relevant Part Of Original Order**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

_____)	
IN RE: DEPUY ORTHOPAEDICS, INC.)	
ASR HIP IMPLANT PRODUCTS)	MDL Docket No. 1:10-md-02197-DAK
LIABILITY LITIGATION)	
-----)	HONORABLE DAVID A. KATZ
)	
THIS DOCUMENT APPLIES TO:)	
)	
ALL CASES)	
)	
_____)	

CASE MANAGEMENT ORDER NO. 20

Procedure for Filing Qualified Settlement Fund Motions

This matter comes before the Court on the issue of the procedure to be followed when filing motions to establish a qualified settlement fund for one or more plaintiffs on an individual firm basis:¹

The motion to establish a qualified settlement fund shall be filed (under seal) in the relevant member action only and not in the Master Case file. If the motion to establish a qualified settlement fund applies to more than one plaintiff, the following procedure shall be followed:

- 1) The motion shall be filed in one and only one of the relevant member actions and shall be made using the form attached hereto as Exhibit 1;

¹ Nothing in this Order changes or affects CMO 19 or the ASR Settlement Escrow Agreement dated as of April 30, 2014.

2) The motion shall include a "Related Cases Exhibit" as Appendix A identifying all of the relevant member actions;

3) The caption of the motion shall identify the member action in which the motion is being filed and shall indicate that the motion is also applicable to the member actions identified in the "Related Cases Exhibit."

For example, assume counsel intends to establish a qualified settlement fund for the following three member actions: (1) *Jane Doe v. DePuy Orthopaedics, et al.* No. 1:09-md-XX1; (2) *Lynn Doe v. DePuy Orthopaedics, et al.* No. 1:09-md-XX2; and (3) *Jennifer Doe v. DePuy Orthopaedics, et al.* No. 1:09-md-XX3.

4) The motion for establishment of a qualified settlement fund should be filed in one of the three member actions. Assuming counsel chooses to file the motion in *Jane Doe v. DePuy Orthopaedics, et al.* No. 1:09-md-XX1, the motion would bear the following caption:

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

)	Case No. 1:09-md-XX1
IN RE: DEPUY ORTHOPAEDICS,)	
INC. ASR HIP IMPLANT)	MDL Docket No. 10-md-02197-DAK
PRODUCTS LIABILITY)	
LITIGATION)	HONORABLE DAVID A. KATZ
-----)	
THIS DOCUMENT APPLIES TO:)	MOTION TO ESTABLISH
)	QUALIFIED SETTLEMENT FUND
<i>Jane Doe v. DePuy Orthopaedics et</i>)	
<i>al.</i>)	
)	
AND RELATED CASES)	
(SEE APPENDIX A))	

5) The "Related Cases Exhibit" (Appendix A) shall then identify the three individual cases to which the motion pertains. *i.e.*, (1) *Jane Doe v. DePuy Orthopaedics et al.* Civil Action No. 1:09-md-XX1; (2) *Lynn Doe v. DePuy Orthopaedics et al.* Civil Action No. 1:09-md-XX2; and (3) *Jennifer Doe v. DePuy Orthopaedics et al.* Civil Action No. 1:09-md-XX3.

6) All motions and accompanying documents shall be filed under seal and authority to do so is hereby granted.

IT IS SO ORDERED:

Dated: June 4, 2014

s/ David A. Katz
Honorable David A. Katz
United States District Court Judge